KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | 63RD FLOOR NEW YORK, NEW YORK 10118

1050 K STREET NW | SUITE 1040 WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.KAPLANHECKER.COM

DIRECT DIAL

929.294.2540

DIRECT EMAI

idabbs@kaplanhecker.com

MEMO ENDORSED

September 30, 2022

BY ECF

Hon. Edgardo Ramos United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: United States v. Neil Cole, 19 Cr. 869 (ER)

Dear Judge Ramos:

The parties write to jointly request a partial adjustment to the current schedule for the parties' submissions in advance of trial, *see* ECF 204, scheduled to commence on October 31, 2022. Pursuant to the current scheduling order, proposed jury instructions, voir dire questions, and verdict sheets are due October 3, 2022. *See id.* The parties request that the deadline for these submissions be adjourned to October 20, 2022.

This is the first request for adjournment as to these deadlines. The proposed adjournment will not require any change in the trial date or other deadlines, including the deadlines for motions *in limine*, which are due on October 3, 2022. We appreciate the Court's consideration.

Respectfully submitted,

Jenna M. Dabbs Counsel for Mr. Cole

cc: Assistant United States Attorneys Andrew Thomas, Jared Lenow, and Justin Rodriguez

Proposed jury instructions, voir dire questions, and verdict sheets are now due October 20, 2022. SO ORDERED.

Edgardo Ramos, U.S.D.J

Dated: 10/3/2022

New York, New York